Case 2:97-cv-03496-DRD-JAD Document 381 Filed 03/31/10 Page 1 of 2 PageID: 4132

## STONE MAGNANINI LLP COMPLEX COMMERCIAL LITIGATION

NEW JERSEY OFFICES 150 JFK Parkway, Short Hills, NJ 07078 P 973.218.1111 F 973.218.1106

March 31, 2010

## VIA CM/ECF, E-MAIL, and U.S. MAIL

Honorable Michael A. Shipp, U.S.M.J. United States District Court for the District of New Jersey Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, New Jersey 07101

Re: Walsh Securities, Inc. v. Cristo Property Management, LTD, et al.

Civil Action No. 97-3496 (DRD/MAS)

Dear Judge Shipp:

We represent Plaintiff Walsh Securities Inc. ("WSI") in the above entitled action. Pursuant to Your Honor's March 5, 2010 Amended Scheduling Order, we write to give you a status of the case and to respectfully request that in light of the circumstances all discovery deadlines be extended by 30 days. All parties represented by counsel and Richard Calanni, *pro se*, consent to this request.

All counsel have conferred and successfully narrowed down the number of witnesses. The parties have gone from potentially taking 150 depositions to 23 depositions. Given the various schedules of counsel and the availability of certain witnesses, setting dates for these 23 depositions has had its difficulties. Counsel have all worked together to ensure that depositions would be covered by someone in their office, even if their own schedule did not permit them attending, and, in some instances, counsel have agreed to not attend certain depositions.

Nevertheless, depositions have been noticed and subpoenas have been issued. We have been able to conclude seven of these depositions and will complete seven more depositions by May 10, 2010. Unfortunately certain witnesses have not been available and will not be available until late May. Others we are still trying to serve. We all believe that with an additional 30 day extension the remaining depositions can be completed.

Honorable Michael A. Shipp March 31, 2010 Page 2 of 2

We thank Your Honor for your kind attention to this matter.

Respectfully submitted,

Rőbert A. Magnanini

ce: David Kott (via CM/ECF only)
Edward J. Hayes (via CM/ECF only)
Martin McGowan (via CM/ECF only)
Vincent Manning (via CM/ECF only)
Richard Calanni (via e-mail)
Richard DiBenedetto (via U.S. Mail)